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May 2, 2025

VIA CM/ECF

The Honorable Mary Kay Vyskocil
District Judge
United States District Court for the Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

RE: *Chamber of Commerce of the U.S.A. v. James*, No. 1:25-cv-01738-MKV

Dear Judge Vyskocil:

Pursuant to Local Rule 1.6 and S.D.N.Y. Rules for the Division of Business Rule 13(b)(3), Plaintiffs the Chamber of Commerce of the United States of America, the American Petroleum Institute, the National Mining Association, and The Business Council of New York State, Inc. respectfully notify the Court of the following related case:

United States v. New York, No. 1:25-cv-03656 (S.D.N.Y.)

Just like Plaintiffs here, the United States filed a lawsuit in this district to challenge the constitutionality of New York's unprecedented Climate Change "Superfund" Act. The United States has marked its case as related to this case and requests that its case be assigned to this Court. *See* Statement of Relatedness, *United States v. New York*, No. 1:25-cv-03656 (S.D.N.Y.), ECF No. 3. The filing of the United States' case in this district is yet another reason this Court should reject Defendants' request to transfer this case to the Northern District of New York. *See* ECF Nos. 33, 34. The United States, like Plaintiffs here, has decided to bring its challenge in this district, and that choice is entitled to deference. As explained in Plaintiffs' Response in Opposition to Defendants' Motion to Transfer, transferring these cases would not serve the convenience of the parties or the interests of justice. *See* ECF No. 37. The United States' filing in this district further confirms that fact.

Respectfully submitted,
/s/ Steven P. Lehotsky
Steven P. Lehotsky

cc: (by CM/ECF, S.D.N.Y.): All counsel of record.